

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

TERRY W. BETTIS, Individually and on ) Civil Action No. 3:17-cv-01112  
Behalf of All Others Similarly Situated, )  
 ) Honorable Waverly D. Crenshaw, Jr.  
Plaintiff, )  
 ) CLASS ACTION

vs. )

ENVISION HEALTHCARE CORPORATION )  
f/k/a ENVISION HEALTHCARE )  
HOLDINGS, INC., et al., )  
 )  
Defendants. )

CARPENTERS PENSION FUND OF ) Civil Action No. 3:17-cv-01323  
ILLINOIS, Individually and on Behalf of All )  
Others Similarly Situated, )  
 ) Honorable Aleta A. Trauger  
Plaintiff, )  
 ) CLASS ACTION

vs. )

ENVISION HEALTHCARE CORPORATION )  
f/k/a ENVISION HEALTHCARE )  
HOLDINGS, INC., et al., )  
 )  
Defendants. )

MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF, AND  
APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL

**ORAL ARGUMENT REQUESTED**

PLEASE TAKE NOTICE that the Laborers Pension Funds hereby move this Court pursuant to the Private Securities Litigation Reform Act of 1995 for an order consolidating the above-captioned actions, appointing the Laborers Pension Funds as Lead Plaintiff, and approving their selection of Robbins Geller Rudman & Dowd LLP as lead counsel for the class.<sup>1</sup> This Motion is based upon the Memorandum of Law and Declaration of Jerry E. Martin filed concurrently herewith.

DATED: October 3, 2017

BARRETT JOHNSTON MARTIN  
& GARRISON, LLC  
JERRY E. MARTIN, #20193

s/ Jerry E. Martin  
\_\_\_\_\_  
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[Proposed] Lead Counsel for Plaintiff

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<sup>1</sup> The Laborers Pension Funds include the Laborers Pension Trust Fund for Northern California and LIUNA National (Industrial) and Staff & Affiliates Pension Funds.

CERTIFICATE OF SERVICE

I hereby certify that on October 3, 2017, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 3, 2017.

s/ JERRY E. MARTIN

JERRY E. MARTIN

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# Mailing Information for a Case 3:17-cv-01112 Bettis v. Envision Healthcare Corporation et al

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